

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JONATHAN SANTIAGO,	)	
Plaintiff,	)	
v.	)	Civil Action No. 13-12172-IT
THOMAS LAFFERTY, <i>et al.</i> ,	)	
Defendants.	)	
NEL SOTHY,	)	
Plaintiff,	)	
v.	)	Civil Action No. 13-12302-IT
THOMAS LAFFERTY, <i>et al.</i> ,	)	
Defendants.	)	

**DEFENDANT THOMAS LAFFERTY'S RESPONSE TO PLAINTIFFS'  
STATEMENT OF FACTS**

The defendant Thomas Lafferty adopts the defendant City of Lowell's responses to the plaintiff's Statement of Facts except for the responses to ## 41, 59, 60, 72, 98, 107, and 136. Lafferty's responses to those are as follows:

- 41. Disputed.
- 59. Disputed.
- 60. Disputed.
- 72. Disputed.
- 98. Disputed.
- 107. Disputed.
- 136. Disputed.

Defendant,

Thomas Lafferty,  
By his attorney,

/s/ Bradford N. Louison  
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**CERTIFICATE OF SERVICE**

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/s/ Bradford N. Louison  
Bradford N. Louison